

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

vs.

JAMES E. GANSMAN ET AL.,

Defendants.

08-cv-4918 (PKC)

**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

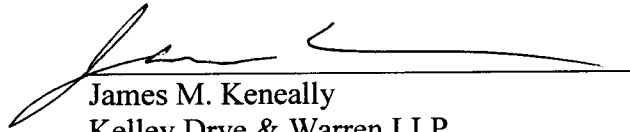
Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, James M. Keneally, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Applicant: Barry J. Pollack
Firm Name: Kelley Drye & Warren LLP
Address: 3050 K Street, NW, Suite 400
City/State/ZIP: Washington, D.C. 20007
Phone Number: (202) 342-8472
Fax Number: (202) 342-8451

Mr. Pollack is a member in good standing of the Bar of the State of Maryland and the Bar of the District of Columbia. There are no pending disciplinary proceedings against Mr. Pollack in any State or Federal court.

New York, New York
July 7, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James M. Keneally', is written over a horizontal line.

James M. Keneally
Kelley Drye & Warren LLP
101 Park Avenue
New York, NY 10178-0002
(212) 808-5018 (tel)
(212) 808-7897 (fax)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND)
EXCHANGE COMMISSION,)

Plaintiff,)

vs.)

JAMES E. GANSMAN ET AL.,)

Defendants.)
_____)

08-cv-4918 (PKC)

**AFFIDAVIT OF JAMES M. KENEALLY
IN SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

State of New York)

ss:)

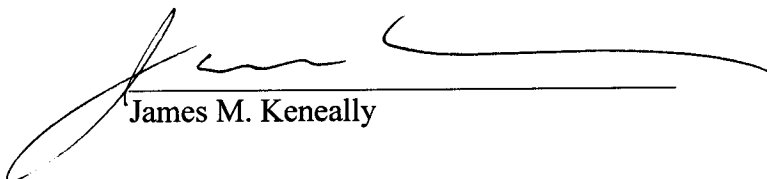
County of New York)

James M. Keneally, being duly sworn, hereby deposes and says as follows:

- (1) I am a partner in the firm Kelley Drye & Warren LLP. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion to admit Barry J. Pollack as counsel *pro hac vice* to represent defendant Donna Murdoch in this matter.
- (2) I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1983. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- (3) I have known Mr. Pollack since 2007.
- (4) Mr. Pollack is also a partner of the firm Kelley Drye & Warren LLP, and practices in the firm's Washington, D.C. office.

- (5) I have found Mr. Pollack to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- (6) Accordingly, I am pleased to move the admission of Mr. Pollack, *pro hac vice*.
- (7) I respectfully submit a proposed order granting the admission of Mr. Pollack, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Barry J. Pollack, *pro hac vice*, to represent defendant Donna Murdoch in the above-captioned matter, be granted.



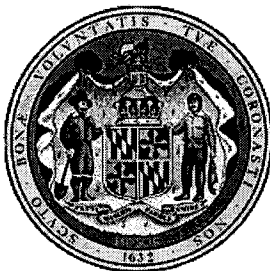
James M. Keneally

Sworn to before me this 7th day of July 2008.

Notary Public: Michelle A. Acuna

Michelle A. Acuna
Notary Public, State of New York
No. 01AC6032557
Qualified in Westchester County
Commission Expires Nov. 1, 2009

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the nineteenth day of December, 1991,*

Barry J. Pollack

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-third day of June, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

BARRY J. POLLACK

was on the 5TH day of OCTOBER, 1992

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 23, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,)	
)	
Plaintiff,)	08-cv-4918 (PKC)
)	
vs.)	ORDER FOR ADMISSION
)	<i>PRO HAC VICE</i>
JAMES E. GANSMAN ET AL.,)	ON WRITTEN MOTION
)	
Defendants.)	
)	

Upon the motion of James M. Keneally and said sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED that

Applicant's Name: Barry J. Pollack

Firm Name: Kelley Drye & Warren LLP

Address: 3050 K Street, NW, Suite 400

City/State/Zip: Washington, D.C. 20007

Telephone: (202) 342-8472

Fax: (202) 342-8451

Email Address: bpollack@kelleydrye.com

is admitted to practice *pro hac vice* as counsel for defendant Donna Murdoch in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall immediately forward the *pro hac vice* fee to the Clerk of the Court.

New York, New York
July 7, 2008

United States District Judge

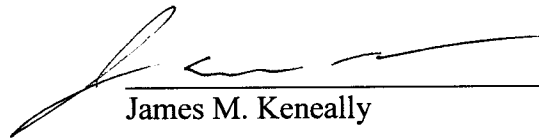
CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of July, 2008, a true and correct copy of the foregoing Motion to Admit Counsel *Pro Hac Vice* was served by first-class United States mail on:

C. Joshua Felker
Cheryl J. Scarboro
J. Lee Buck
James Andrew Kidney
United States Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Robert B. Blackburn
United States Securities and Exchange Commission
233 Broadway
New York, NY 10279

Caryn Gail Schechtman
DLA Piper US LLP
1251 Avenue of the Americas
New York, NY 10020


James M. Keneally